

WC Docket No. 14-149

**WILLKIE FARR & GALLAGHER LLP**

1875 K Street, N.W.  
Washington, DC 20006-1238

**ACCEPTED/FILED**

Tel: 202 303 1000  
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August 28, 2014

AUG 28 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

**Re: Section 63.71 Discontinuance Application of tw telecom of idaho llc**

Dear Ms. Dortch:

Pursuant to Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, enclosed is the application of **tw telecom of idaho llc** to discontinue the VersiPak Mach2 Service, VersiPak Mach3 Service, VersiPak Lines and Trunks Service, VersiPak IPRI Service, VersiPak Service Packages, VersiPak Flex® T Service, VersiPak Power® T Service, Basic Business Line Service, Business Terminals Service, PBX Analog Trunk Service, PBX Digital Trunk Service, Direct Inward Dial (DID) Service, and Primary Rate ISDN (PRI) Service in the Boise, Idaho metropolitan area. Notice of the proposed discontinuance is being filed under separate cover with the International Bureau pursuant to Section 63.19 of the Commission's rules, 47 C.F.R. § 63.19.

Please contact the undersigned with any questions regarding this application.

Respectfully submitted,



Mia Guizzetti Hayes  
Daniel R. Bumpus

*Counsel for tw telecom of idaho llc*

cc: Idaho Public Utilities Commission  
Governor C. L. "Butch" Otter  
Secretary of Defense, Attn. Special Assistant for Telecommunications  
Mindel De La Torre

cc (via email): Rodney McDonald  
Carmell Weathers  
Kimberly Jackson  
David Krech  
Troy Tanner  
James Ball

**DOCKET FILE COPY ORIGINAL**

Enclosure

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
)  
Application of )  
**tw telecom of idaho llc** )  
For Authority Pursuant to Section 63.71 )  
Of the FCC's Rules, 47 C.F.R. § 63.71, )  
To Discontinue the )  
VersiPak Mach2 Service, )  
VersiPak Mach3 Service, )  
VersiPak Lines and Trunks Service, )  
VersiPak IPRI Service, )  
VersiPak Service Packages, )  
VersiPak Flex® T Service, )  
VersiPak Power® T Service, )  
Basic Business Line Service, )  
Business Terminals Service, )  
PBX Analog Trunk Service, )  
PBX Digital Trunk Service, )  
Direct Inward Dial (DID) Service, and )  
Primary Rate ISDN (PRI) Service, )  
in the Boise, Idaho )  
Metropolitan Area )

**ACCEPTED/FILED**

**AUG 28 2014**

*Federal Communications Commission  
Office of the Secretary*

WC Docket No. \_\_\_\_

**SECTION 63.71 APPLICATION OF  
TW TELECOM OF IDAHO LLC**

**tw telecom of idaho llc** ("tw telecom of idaho"), a wholly-owned direct subsidiary of **tw telecom holdings inc.** and a wholly-owned indirect subsidiary of **tw telecom inc.**, requests authority under Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, to discontinue the voice service component of the VersiPak Mach2 Service, VersiPak Mach3 Service, VersiPak Lines and Trunks Service, VersiPak IPRI Service, VersiPak Service Packages, VersiPak Flex® T Service, VersiPak Power® T Service, Basic Business Line Service, Business Terminals Service, PBX Analog Trunk Service, PBX Digital Trunk Service, Direct Inward Dial (DID) Service, and Primary Rate ISDN (PRI) Service (collectively the "Services") in the Boise, Idaho metropolitan

area. Notice of the proposed discontinuance is being filed simultaneously with the International Bureau pursuant to Section 63.19 of the Commission's rules, 47 C.F.R. § 63.19.

As required by Sections 63.71(a) and (b) of the Commission's rules, **tw telecom of idaho** provides the following information in support of its discontinuance request:

**Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):**

**tw telecom of idaho llc**  
Customer Care, Network Operations Center  
2342 Technology Drive, Summit 1  
O'Fallon, MO 63368

**tw telecom of idaho llc**  
Corporate Headquarters  
10475 Park Meadows Drive  
Littleton, CO 80124

**Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)) and Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):**

**tw telecom of idaho** intends to discontinue the Services in the Boise, Idaho metropolitan area on or after October 15, 2014, subject to Commission authorization to discontinue the Services pursuant to 47 C.F.R. § 63.71(c).

**Brief Description of Type of Services Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):**

Each of the VersiPak offerings is part of an integrated business solution that includes a voice service component along with Internet Access provisioned over a single facility. The remainder of the Services are standalone business voice service offerings.

**VersiPak Mach2 Service** and **VersiPak Mach3 Service** consist of integrated voice and Internet bandwidth.

**VersiPak Lines and Trunks Service** is the voice portion of an integrated, multi-service, packet-based access service that delivers voice and data services over a single DS1.

**VersiPak IPRI Service** is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS1.



**VersiPak Service Packages, VersiPak Flex® T Service, and VersiPak Power® T Service** are bundled services consisting of local exchange service with selected features.

**Basic Business Line Service** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.

**Business Terminals Service** provides a physical appearance in the switch and is assigned to a unique channel.

**PBX Analog Trunk Service** provides a voice-grade telephonic communications channel that can be used to place or receive one call at a time.

**PBX Digital Trunk Service** provides a DS1 connection between customer-provided PBX equipment or trunk capable key systems and the **tw telecom of idaho** switch.

**Direct Inward Dial (DID) Service** allows a PBX user to have incoming calls reach a specific end user without the assistance of an attendant.

**Primary Rate ISDN (PRI) Service** allows a connection between ISDN Customer Premises Equipment and **tw telecom of idaho** switching equipment using a Primary Rate Interface over a digital transport facility.

**Brief Description of the Date and Method of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):**

**tw telecom of idaho** notified its affected Boise metropolitan area customers of the planned discontinuance of the Services by letter sent via U.S. mail on August 28, 2014. A copy of the customer notification letter is appended hereto. The letter informs affected customers that, with the required FCC approval, **tw telecom of idaho** plans to discontinue the Services on or after October 15, 2014.

**Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):**

**tw telecom of idaho** is considered a non-dominant carrier in its provision of the Services in the Boise metropolitan area.

**Other Information (47 C.F.R. § 63.71(b)(5)):**

Copies of this Application are being sent via First-Class U.S. Mail to the Idaho Public Utilities Commission, the Governor of Idaho, and the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

Please direct questions regarding this application to:

Mia Guizzetti Hayes  
Willkie Farr & Gallagher LLP  
1875 K Street, N.W.  
Washington, DC 20006  
(202) 303-1197  
mhayes@willkie.com

**Conclusion:**

The public convenience and necessity will not be adversely affected by the discontinuance of **tw telecom of idaho's** Services in the Boise metropolitan area. All affected customers have been given notice that affords them ample time to acquire reasonable substitute services, which are readily available in the Boise metropolitan area and include, but are not limited to, other services offered by **tw telecom of idaho**. Therefore, **tw telecom of idaho** respectfully requests that the Commission approve this Section 63.71 Application to discontinue the Services in the Boise metropolitan area.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rochelle D. Jones", written over a horizontal line.

Rochelle D. Jones  
Vice President – Regulatory  
**tw telecom holdings inc.**

Dated: August 28, 2014

**Attachment: Customer Notification Letter**



tw telecom of idaho llc  
Customer Care  
2342 Technology Drive  
Summit 1  
O'Fallon, MO 63368

Telecommunications Services Manager  
Insert Company Name  
Insert Billing Address 1  
Insert Billing City, State Zip

August 28, 2014

Service Address: [INSERT SERVICE ADDRESS]

**Important Notice Regarding the Planned Discontinuance of Certain Traditional Voice Services  
Provided by tw telecom of idaho llc ("tw telecom")**

Dear Customer,

**This letter serves as formal notice that certain voice services provided by tw telecom to your company and throughout the Boise, Idaho metropolitan area will be discontinued on or after October 15, 2014, provided that tw telecom receives the approval of the Federal Communications Commission ("FCC").**

You are receiving this notice because you currently subscribe to one or more of the following **tw telecom** services, which, subject to the approval of the FCC, will be discontinued as a result of the planned decommission of a **tw telecom** Boise voice switch.

- **VersiPak Mach2 Service and VersiPak Mach3 Service** consist of integrated voice and Internet bandwidth.
- **VersiPak Lines and Trunks Service** is the voice portion of an integrated, multi-service, packet-based access service that delivers voice and data services over a single DS1.
- **VersiPak IPRI Service** is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS1.
- **VersiPak Service Packages, VersiPak Flex® T Service and VersiPak Power® T Service** are bundled services consisting of local exchange service with select features.
- **Basic Business Line Service** provides voice grade telephonic communications channels that can be used to place or receive one call at a time.
- **Business Terminals Service** provides a physical appearance in the switch and is assigned to a unique channel.
- **PBX Analog Trunk Service** provides a voice-grade telephonic communications channel that can be used to place or receive one call at a time.
- **PBX Digital Trunk Service** provides a DS1 connection between customer-provided PBX equipment or trunk capable key systems and the **tw telecom** switch.
- **Direct Inward Dial (DID) Service** allows a PBX user to have incoming calls reach a specific end user without the assistance of an attendant.
- **Primary Rate ISDN (PRI) Service** allows a connection between ISDN Customer Premises Equipment and **tw telecom** switching equipment using a Primary Rate Interface over a digital transport facility.



In order to maintain continuous service at your location, **tw telecom** would like to work with you to migrate your existing service to our next-generation, state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency.

Please contact me as soon as possible to ensure a seamless and uninterrupted transition of your voice service.

**If you have not made arrangements with tw telecom or another telecommunications service provider to replace your voice service listed above prior to October 15, 2014, please be advised that your service will be disconnected on or after October 15, 2014, provided that the FCC approves the planned discontinuance.**

We understand that this is an inconvenience, and we are confident that our team can seamlessly manage the entire process to provide your business with a better communications solution.

If you also subscribe to other services from **tw telecom**, those services will NOT be impacted by the anticipated discontinuance of the affected **tw telecom** services. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We would like to work with you immediately to update your service and continue our valued relationship, so please contact me before October 15, 2014 to discuss our migration plan.

Sincerely,

Account Rep Name

**tw telecom**

Account Rep Phone

Account Rep email

**tw telecom of idaho llc is required by the FCC to provide the following statement:**

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of **tw telecom of idaho llc**. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

**CERTIFICATE OF SERVICE**

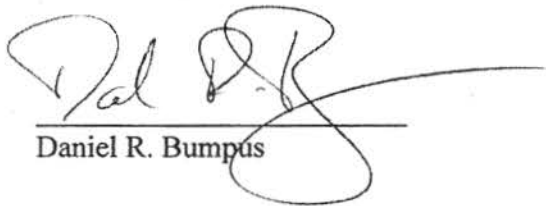
I, Daniel R. Bumpus, do hereby certify that on this day, August 28, 2014, I caused to be served a true and correct copy of the foregoing Section 63.71 Application of **tw telecom of idaho llc** via First-Class U.S. Mail, postage prepaid, to the following:

Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074  
(208) 334-0300

Governor C. L. "Butch" Otter  
State Capitol  
P.O. Box 83720  
Boise, ID 83720  
(208) 334-2100

Secretary of Defense  
Attn: Special Asst. for Telecommunications  
Pentagon  
Washington, DC 20301  
(703) 571-3343

Mindel De La Torre  
Chief, International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

  
Daniel R. Bumpus